

SHE-12

MAR 5 1987

CERTIFIED MAIL
RETURNED RECEIPT REQUESTED

Stephen W. Holt
Senior Environmental Engineer
Environmental Control Department
NL Industries, Inc.
P.O. Box 1090
Hightstown, New Jersey 08520

RE: NL Industries/Taracorp-Granite City, Ill.

Dear Mr. Holt:

On March 11, 1985, the United States Environmental Protection Agency (U.S. EPA) entered into an Administrative Order by Consent (Consent Order) with the Respondents of the above-named site. The purpose of the Consent Order is to conduct a Remedial Investigation and Feasibility Study (RI/FS) to determine the nature, extent, and cause of contamination at the site, and to evaluate and determine a viable remedial action alternative. The Consent Order was issued pursuant to the authority vested in the Regional Administrator of the U.S. EPA by Section 106 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42 U.S.C. §9606(a).

On October 17, 1986, the President of the United States signed the Superfund Amendments and Reauthorization Act of 1986 (SARA). The primary purpose of SARA is to extend and amend the authorities of CERCLA. The main provision of SARA that will impact the RI/FS is Section 121, Cleanup Standards. Section 121 establishes a variety of mandatory requirements relating to the level of cleanup for remedial actions under CERCLA. It also establishes additional directives for selecting permanent remedies and for meeting State requirements. A copy of this Section is enclosed. Also enclosed is a memorandum from J. Winston Porter, Assistant Administrator for Solid Waste and Emergency Response, subject: Interim Guidance on Superfund Selection of Remedy, dated December 24, 1986, which provides further guidance on this matter. A brief summary of Section 121 is as follows:

- Permanent Solutions - SARA requires the selection of remedial actions that utilize permanent solutions and alternative treatment technologies to resource recovery technologies, to the maximum extent practicable.

- Compliance with other laws - Section 101 of SARA requires remedial actions to attain a degree of cleanup and control of further release which protects "in as great and the government, for onsite actions, the requires remedial actions to at least attain legally applicable or relevant and appropriate Federal and State standards, requirements, criteria, or limitations (laws). For offsite actions, the transfer of hazardous substances, pollutants, or contaminants will only be allowed to facilities operating in compliance with CWA (or other Federal laws where applicable) and all applicable state requirements.

Expect to be contacted in the near future to discuss the SARA requirements for the 21/FS work either scheduled or currently underway at the above-referenced site. You should contact the State of Illinois to obtain state laws for each of the remedial alternatives being analyzed. This in no way affects your obligation under the present consent order or requirements to comply with the time schedules contained therein.

If you have any questions regarding this matter, you may contact Brad Bradley, the Remedial Project Manager, at 312/796-4197.

Sincerely yours,

David E. Constantelos, Director
Waste Management Division

Enclosures

cc: Ron Miller, EPA

cc: R. Stiefenbach
R. Ornes, SC-16

YJB 2/25/87

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Stephen W. Holt
Senior Environmental Engineer
Environmental Control Department
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P.O. Box 1090
Highstown, New Jersey 08520

PS Form 3800, June 1985

Postage and Fees	
Basic Rate (Domestic)	73
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Postage and Fees (Total)	73
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Handwritten: No other fees / 5/11/85